

RENE L. VALLADARES  
Federal Public Defender  
State Bar No. 11479  
**RICK MULA**  
Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
(702) 388-6261/Fax  
[Rick.Mula@fd.org](mailto:Rick.Mula@fd.org)

Attorney for Erik Rojo

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

v.

ERIK ROJO.

**Defendant.**

Case No. 2:23-cr-00216-APG-EJY

**STIPULATION TO CONTINUE  
REVOCATION HEARING**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Justin J. Washburne, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula, Assistant Federal Public Defender, counsel for Erik Rojo, that the Revocation Hearing currently scheduled on August 20, 2024, be vacated and continued to a date and time convenient to the Court, but no sooner than four (4) months.

This Stipulation is entered into for the following reasons:

1. United States Probation Officer Cecil McCarroll executed a Petition for Summons for Offender Under Supervision on March 11, 2024. (ECF No. 5.)
  2. The Court granted the petition on March 14, 2024. (ECF No. 6.)

1       3.     Mr. Rojo made an initial appearance (at liberty) on March 28, 2024. (ECF No.  
2 9.) The government did not seek detention, and Mr. Rojo was not detained. (*Id.*) The Court set  
3 a revocation hearing for April 15, 2024. (*Id.*)

4       4.     The Court later continued the revocation hearing to April 16, 2024. (ECF No.  
5 12.)

6       5.     The revocation hearing took place on April 16, 2024. (ECF No. 14.) Mr. Rojo  
7 admitted to the violations alleged in the petition. (*Id.*) The Court then held this matter in  
8 abeyance to allow Mr. Rojo time to come into compliance. (*Id.*) The Court continued the  
9 revocation hearing to August 20, 2024. (*Id.*)

10      6.     Counsel for the parties conferred with Officer McCarroll in advance of the  
11 August 20, 2024 revocation hearing. Officer McCarroll informed the parties that Mr. Rojo was  
12 arrested by his state court probation officer on parole violations on May 10, 2024, and was  
13 continuously incarcerated until his release on August 6, 2024. (The violations mirrored those  
14 in this case.) Officer McCarroll proposed continuing the revocation hearing for another four  
15 months to allow Mr. Rojo time to regain compliance with the conditions of his supervised  
16 release. The parties agreed with Officer McCarroll's proposal.

17      7.     The defendant is out of custody and agrees with the need for the continuance.

18      8.     The parties agree to the continuance.

19           This is the first request for a continuance of the revocation hearing.

20           DATED this 9th day of August, 2024.

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22          RENE L. VALLADARES  
23           Federal Public Defender

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25          JASON M. FRIERSON  
26           United States Attorney

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28          By /s/ Rick Mula  
29          RICK MULA  
30          Assistant Federal Public Defender

31  
32          By /s/ Justin J. Washburne  
33          JUSTIN J. WASHBURN  
34          Assistant United States Attorney

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UNITED STATES OF AMERICA,  
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## **ORDER**

ERIK ROJO,  
Defendant.

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DATED this 12th day of August, 2024.

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**UNITED STATES DISTRICT JUDGE**